

Exhibit F

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	15-cv-9903 (GBD) (SN) ECF Case

DECLARATION OF DAVID KLETSMAN

I, David Kletsman, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below.

The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.
2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.
3. On September 11, 2001, I was present at the North Tower when the terrorist attacks of the World Trade Center Towers occurred.
4. On September 11, 2001 I was employed and working at the New York Metropolitan Transportation Council.
5. I was in New York at Ground Zero in the North Tower as the first plane hit and I received physical injuries in the escape and collapse. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. When we were brutally attacked by terrorists my life was altered forever. I had never seen nor could I have imagined anything like it.

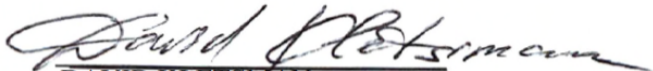
6. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: acute, intense pain in my left shoulder from falling debris, and strain of carrying another person from the building; anxiety, Post Traumatic Stress Disorder ("PTSD"), uncontrolled Hypertension; restrictive lung disease; chest pain, and palpitation. As a result of my injuries, I was unable to return to work until a month after the attacks.
7. The various sights, sounds, and traumas I witnessed on 9/11 led to PTSD I have suffered from ever since. At the New York Metropolitan Transportation Council, my work day began at 7:30am. I was sitting at my desk in our office located on the 82nd floor of the North Tower on the morning of the attacks. I was speaking on the phone to a regional office representative when I noticed something was going on. There was so much confusion and no one seemed to know what was happening. My coworkers and I were directed to leave the office and we took the stairs down. It took about an hour to get to the lobby. There was smoke filling the staircase. Although we were all scared and confused, we helped each other get out. When we got outside we finally found out what was going on. Then the first tower collapsed and we were engulfed by dust and debris. I was hit by falling debris and I believe this is when I injured my shoulder. That injury was then exacerbated when I helped carry another person away from the scene. We escaped as a group across the Brooklyn Bridge.
8. The effects of PTSD are still with me to this day. I took a month off work after 9/11 to engage in physical therapy for my shoulder, but also for therapy for my mental state. I saw a team of psychologists and was diagnosed with PTSD. I was not able to sleep without nightmares. Previously routine events became triggering for me and I

experienced flashbacks. I have tried many treatments including prescription medications and therapy. While they have helped, the experience will never leave me.

9. Within 24 hours of the 9-11 attack, I sought treatment for my injured shoulder, and continue to seek medical attention for all my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my medical records related to the treatment that I received following the September 11, 2001 terrorist attacks, such that I still have in my possession.
10. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from anxiety and bouts of depression due to the traumatic events of these terrorist attacks.
11. I never filed with either Victim Compensation Fund because in the aftermath of 9/11, I simply felt lucky to be alive.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 2 day of January 2020.


DAVID KLETSMAN

Exhibits Filed Under Seal